

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division**

DARLA V. EDWARDS

Plaintiff

Civil Action No.: 5:23-cv-74

v.

JAMES MADISON UNIVERSITY

and

VIRGINIA ADVANCED STUDIES STRATEGIES

DBA "VIRGINIA EDUCATION STRATEGIES"

("VES")

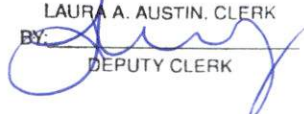
and

JENNIFER STEVENS

Defendants

CLERK'S OFFICE U.S. DISTRICT COURT
AT ROANOKE, VA
FILED

JUL 02 2025

LAURA A. AUSTIN, CLERK
BY: 
DEPUTY CLERK


**SUPPLEMENTAL DECLARATION IN SUPPORT OF PLAINTIFF'S MOTION FOR
CONTINUANCE AND IN OPPOSITION TO RETALIATORY SUBPOENA TO
PLAINTIFF'S SMALL BUSINESS**

1. I, Darla Edwards, am the Plaintiff in the above-captioned matter and submit this supplemental declaration to bring to the Court's attention new retaliatory conduct by the Defendants that occurred after the filing of my Motion for Continuance due to Medical Hardship.
2. On or about June 26, 2025, I submitted a motion requesting a brief continuance based on documented mental health hardship, including PTSD and related symptoms that have been exacerbated by the litigation process.

3. Shortly thereafter, on July 2, 2025, Defendants issued a subpoena deposition directed at my small business, Successful Innovations, which is not a party to this litigation and has no direct involvement in the claims in this matter.
4. This subpoena appears to be retaliatory in nature and designed to harass and intimidate me in response to my protected activity, specifically, my request for medical accommodation and continuance. The timing, combined with the lack of relevance, supports the conclusion that this is part of an ongoing pattern of pressure tactics by Defendants.
5. Defendants have previously mischaracterized my business as a "competing business," despite the fact the Board of Directors of VES was aware of my business at the time of hiring and explicitly determined there was no conflict of interest. My business operates in a distinct area of education completely different from the services that VES provides.
6. The subpoena imposes an undue burden on me and my business, particularly during a time when I am medically vulnerable, seeking co-counsel, and actively seeking ADA-related accommodations to participate meaningfully in this case.
7. I respectfully request that the Court take this new development into account when ruling on my Motion for Continuance and consider it further evidence of the coercive and retaliatory environment I have been subjected to throughout this litigation.

Executed on July 2, 2025

Respectfully submitted,



Darla V. Edwards

*address on file with clerk
edwardsdv2023@gmail.com

CERTIFICATE OF SERVICE


I hereby certify that on July 2, 2025, I filed the Supplemental Declaration in Support of Plaintiff's Motion of Continuance and Opposition to Retaliatory Subpoena on Plaintiff's Small Business with the Clerk of the Court. All parties were electronically notified via the Court's CM/ECF system on July 2, 2025. Physical mailing was completed on July 2, 2025 via Certified mail to:

Shelley Cupp Schulte, PC
c/o Tim Schulte
3 W Cary St.
Richmond, VA 23220

McGuire Woods
c/o Heidi Siegmund
Gateway Plaza
800 E. Canal St.
Richmond, VA 23219

JMU
800 S Main St
Harrisonburg, VA 22807
c/o Richard Shayegan

Submitted – July 2, 2025


Darla V. Edwards